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February 18, 2025

VIA ECF

Hon. J. Paul Oetken
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

**Re: Hiteks Solutions, Inc. v Citibank, N.A. 1:25-cv-200 (JPO)
Joint Request to Adjourn Scheduling Conference and Related
Submissions for Two Weeks (Docket Entry #4)**

Your Honor:

Counsel in the above-captioned matter jointly request that the initial pretrial conference currently scheduled for February 21, 2025 at 11:00 A.M be adjourned for approximately two weeks, until the week of March 10th. (*See generally* Docket Entry 4, Order). This is the parties' first such request.

This request is not made for delay or otherwise for any improper purpose. Rather, counsel for the parties have been conferring, and last week agreed to an additional mutual exchange of information, both in good faith and in furtherance of their respective evaluation of the parties' claims and defenses.

While the exchange is part of an ongoing effort to resolve the matter extra-judicially and without further court involvement, the information is not just related to settlement. It will also impact the parties' respective scheduling proposals, responsive pleading(s), and general case management plans. For this reason, we similarly request that the related case management plan submission deadline be likewise adjourned.

Subject to Your Honor's approval and availability, the undersigned counsel are generally available Monday, March 10th, Tuesday, March 11th, or Thursday, March 13th for the Conference. We also can provide additional dates at Your Honor's Request.

Respectfully submitted,

DeBenedictis & DeBenedictis LLC

Zeichner Ellman & Krause LLP

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